

BEEDE WASTE OIL SITE
(Identification Code - 011T)

REMOVAL ACTION
ADMINISTRATIVE RECORD FILE ADDITION

AND

INDEX

Prepared For:

U.S. Environmental Protection Agency
Region I
Emergency Planning and Response Branch
John F. Kennedy Federal Building
Boston, Massachusetts 02203

CONTRACT NO. 68-W5-0009

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October 1997
(Revised July 1999)

INTRODUCTION

This document is the revised Index¹ of the Addition to the Administrative Record File for the Beede Waste Oil Site Removal Action. The Index cites site-specific documents used by the U.S. Environmental Protection Agency (EPA) staff in selecting a response action at the site. The proposed EPA removal action will include the following activities: removing and disposing of polychlorinated biphenyls (PCBs) greater than 2 parts per million (ppm) from tanks at the site; removing and disposing sludge from tanks out of which EPA has removed or will remove PCBs greater than 2 ppm or which exhibits Resource Conservation and Recovery Act (RCRA) characteristics; removing, treating, and discharging water from tanks out of which formerly contained PCB-contaminated wastes; and removing and disposing of drums with PCBs between 2 and 50 ppm. Those materials which are determined to be hazardous waste will be treated or disposed of in accordance with State and Federal regulations. All substances transported off site will be disposed of at a facility in compliance with the Code of Federal Regulations (CFR), Title 40, Protection of the Environment, Part 300, National Oil and Hazardous Substance Pollution Contingency Plan, Section 440, Procedures for Planning and Implementing Off-Site Response Actions (40 CFR 300.440).

The Administrative Record File is available for public review at the Superfund Records Center, 1 Congress Street, Suite 1100, Boston, MA 02114, and at the Plaistow Public Library, 14 Elm Street< Plaistow, New Hampshire 03865. Questions concerning the Administrative Record File should be addressed to EPA On-Scene Coordinator Ted Bzenas.

The Administrative Record File is required by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) 42 U.S.C. Section 9613 (k) and EPA's implementing regulations, 40 CFR Section 300.800-825.

PLEASE NOTE: THE FOLLOWING DOCUMENTS COMPILED IN THIS ADMINISTRATIVE RECORD HAVE BEEN MADE FROM THE BEST AVAILABLE COPIES.

¹ The revision is the inclusion of a citation in the Index for Document 50, the October 1997 Removal Program After Action Report for the Beede Waste Oil Site by Roy F. Weston. This report was released along with the other documents contained in this Administrative Record, but was inadvertently omitted from the Index.

SITE-SPECIFIC DOCUMENTS

ADMINISTRATIVE RECORD FILE ADDITION INDEX for the Beede Waste Oil Site Removal Action

REMOVAL

Correspondence (Site File 2.01)

1. Letter to Mr. Donald Berger, Emergency Planning & Response Branch, United States Environmental Protection Agency, 60 Westview Street, Mail Stop EEB-LEX, Lexington, Massachusetts, 02173, from State of New Hampshire Department of Environmental Services, 6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095, concerning the decision for installation of oil recovery system at Beede Waste Oil/Cash Energy Site using Oil Pollution Act (OPA) of 1990 Emergency Response Fund, dated 14 April 1995.
2. Letter to Mr. Charles Crocetti, PhD, Sanborn, Head & Associates, Inc., 6 Garvin Falls Road, Suite 1, Concord, NH 03301-5174, from Robert P. Minicucci II, PE, Groundwater Protection Bureau, New Hampshire Department of Environmental Services (NH DES), regarding sampling and analysis plan revised 3 July 1995 (DES# 840468), dated 7 July 1995.
3. Letter to Paul Currier, PE, Department of Environmental Services, Waste Management Division, Six Hazen Drive, Concord, NH, 03301, from On-Scene Coordinator Ted Bazenas, EPA Region I, concerning residual contents of aboveground storage tanks at Beede Waste Oil Site, Plaistow, NH, dated 11 March 1997.
4. Letter to Linda Murphy, Director, Office of Site Remediation and Restoration, US EPA-New England, JFK Federal Building (HBO), Boston, MA 02203-2211, from Philip J. O'Brien, Ph.D., Director, Waste Management Division, New Hampshire Department of Environmental Services, regarding Agreements for Additional Removals in Support of the Remedial Investigation (DES 840468) at the Beede Waste Oil site, dated 20 March 1997.
5. Memorandum to Philip J. O'Brien, Ph.D., Director, Waste Management Division, State of New Hampshire Department of Environmental Services (NHDES), 6 Hazen Drive, P.O. Box 95, Concord, NH, 03302-0095, from Linda Murphy, Director, Office of Site Remediation and Restoration, Waste Management Division, State of New Hampshire

Environmental Services, regarding the letter of 20 March 1997 concerning the Beede Waste Oil Site in Plaistow, NH, dated 1997.

Removal Reports (Site File 2.02)

6. "Removal Program Preliminary Assessment/Site Investigation for Beede Waste Oil Site, Plaistow, NH", prepared by Roy F. Weston, Inc., Superfund Technical Assessment and Response Team (START) for EPA Region I, December 1993.
7. Public Health Assessment for Beede Waste Oil, Plaistow, Rockingham County, New Hampshire, CERCLIS NO. NHD018958140, prepared by the U.S. Department of Health and Human Services Public Health Service Agency for Toxic Substances and Disease Registry, under cooperative agreement with New Hampshire Department of Environmental Services (NHDES), dated 7 June 1996.

Sampling and Analysis Data (Site File 2.03)

8. "Site and Waste Characterization, Beede Waste Oil/Cash Energy Site, Plaistow, New Hampshire", Volumes I and II, prepared by Sanborn, Head & Associates Inc., dated 29 September 1995.
9. "AST Sampling and Analysis, Beede Waste Oil/Cash Energy Site, Plaistow, New Hampshire", prepared by Sanborn, Head & Associates, Inc., dated 25 January 1996.
10. Work Plan for Removal of Recyclable Used Oil, Beede Waste Oil/Cash Energy Site, Plaistow, New Hampshire", prepared by Sanborn, Head & Associates, Inc., dated 3 June 1996.
11. "Cost Proposal and Work Plan for Additional Environmental Services, Beede Waste Oil/Cash Energy Site, Plaistow, New Hampshire", prepared by Sanborn, Head & Associates, dated 15 July 1996.
12. "Oil Removal Monitoring, Beede Waste Oil/Cash Energy Site, Plaistow, New Hampshire", prepared by Sanborn, Head & Associates, dated 23 January 1997.
13. Letter to Thomas Condon, US EPA Region I, from Robert P. Minicucci II, PE, Groundwater Protection Bureau, New Hampshire Department of Environmental Services, regarding Groundwater Sample Taken 6 December 1994 (DES #840468), at Plaistow -- Beede Waste Oil/Cash Energy Site, dated 5 January 1995.
14. Memorandum from Greg Guimond, OHM Remediation Services Corp.,

to Mike Blodgett, regarding Project #19028: Review of Southwest Laboratory of Oklahoma data package for aqueous stream samples, dated 2 May 1997.

15. Sampling, Analysis, and Quality Assurance Plan for Beede Waste Oil Site, Plaistow, New Hampshire, prepared for EPA Region I by OHM Remediation Services Corp., dated 5 September, 1996.
16. Memorandum Regarding Analysis of Polychlorinated Biphenyls (PCBs) in water samples -- Beede Waste Oil, prepared by EPA Region I, dated 23 September 1994.
17. Memorandum Regarding Beede Waste Oil -- PCB Testing results, prepared by EPA Region I, dated 23 November 1994.
18. Letter to R. Minicucci (NHDES) Regarding Beede Waste Oil Site -- Sediment Sampling Results, prepared by EPA Region I, dated 1 May 1995.
19. Site Inspection Report for Beede Waste Oil, Plaistow, New Hampshire, CERCLIS NO. NHD018958140, prepared by New Hampshire Department of Environmental Services (NHDES), dated 27 January 1995.
- * The remaining sampling and analysis data may be found referenced at the end of this index.

Pollution Reports (Site File 2.04)

20. Pollution Report No. 1 from EPA Region I concerning the Beede Waste Oil Superfund Site Removal Action, dated 5 August 1996.
21. Pollution Report No. 2 from EPA Region I concerning the Beede Waste Oil Superfund Site Removal Action, dated 19 August 1996.
22. Pollution Report No. 3 from EPA Region I concerning the Beede Waste Oil Superfund Site Removal Action, dated 30 January 1997.
23. Pollution Report No. 4 from EPA Region I concerning the Beede Waste Oil Superfund Site Removal Action, dated 30 June 1997.

Action Memorandum (Site File 2.09)

24. Memorandum from Ted Bazenas, On-Scene Coordinator (OSC), EPA Region I, and Wing Chau, OSC, EPA Region I, to Linda M. Murphy, Director, Office of Site Remediation and Restoration, EPA Region I, concerning a request for a 12-month and \$2 Million Exemption for a

Continued Removal Action at the Beede Waste Oil Site, Plaistow, New Hampshire, dated 3 April 1997, signed 4 April 1997. The Enforcement Section of the Memorandum is withheld as being CONFIDENTIAL.

25. Memorandum addendum from Ted Bzenas, On-Scene Coordinator (OSC), EPA Region I, to Linda M. Murphy, Director, Office of Site Remediation and Restoration, EPA Region I, concerning a request for an increased total project ceiling for a continued removal action at the Beede Waste Oil Site, Plaistow, NH - dated and signed 23 July 1997.

STATE COORDINATION

Correspondence (Site File 9.01)

26. Letter from Stephen Merrill, Governor, State of New Hampshire, to Carol Browner, Administrator, US EPA, regarding Beede/Cash Energy Site, Plaistow, New Hampshire, dated 24 July 1995.

ENFORCEMENT

Administrative Order (Site File 10.07)

27. Administrative Order issued by Edward J. Conely, Director, EPA Region I, to Mark O. Henry, Trustee, 35 Evergreen Drive, North Andover, MA, 01845.
28. Letter from Mark O. Henry, Trustee, Hampshire Realty Trust, 7 Kelley Road, Plaistow, New Hampshire, to Thomas Condon, EPA Region I, concerning response to Administrative Order, dated 23 June 1995.

Dispute Resolution/Non-Compliance Documents (Site File 10.17)

29. Letter from Edward J. Conely, Director, Environmental Services Division, EPA Region I, to Mark O. Henry, Trustee, 35 Evergreen Drive, North Andover, MA, 01845, concerning 8 June 1995 Administrative Order for Removal Action at the Beede Waste Oil Corporation/Cash Energy Inc. Site (the "Site"), Docket No. CWA-311AO-95-001, dated 24 July 1995.

POTENTIALLY RESPONSIBLE PARTY (PRP)

PRP - Specific Correspondence (Site File 11.09)

30. Letter from Donald F. Berger, Emergency Planning and Response Branch, EPA Region I to Hampshire Realty Trust, c/o Mark Henry and Kathleen O'Connor, Trustees, 35 Evergreen Drive, North Andover, MA, 19845,

concerning notice of potential liability and invitation to perform or finance proposed cleanup activities: Beede Waste Oil Site, 7 Kelley Road, Plaistow, Rockingham County, New Hampshire, dated 2 July 1996.

COMMUNITY RELATIONS

News Clippings/Press Releases (Site File 13.03)

31. "Cleanup Begins at Plaistow Oil Site", EPA Press Release dated 9 August 1996.
32. Beede Waste Oil/Cash Energy Site Newsletter, Volume 1, No. 1, dated April 1997.
33. Beede Waste Oil/Cash Energy Site Newsletter, Volume 1, No. 2, dated June 1997.
34. "Administrative Record File Available for the Beede Waste Oil Site Removal Action", text of the announcement as it was requested to appear in the *Haverhill Gazette*, Haverhill, Massachusetts.

Public Meetings/Hearings (Site File 13.04)

35. Discussion items for meeting with Plaistow Board of Selectmen, dated 14 April 1997.
36. Summary of Presentation to the Board of Selectmen Meeting held in Plaistow, NH on 14 April 1997, from Angela Bonarrigo to Jim DiLorenzo, Paul Currier, Bob Minicucci, and Ted Bazenas, dated 16 April 1997.

*** Sampling and Analysis Data** for entries 37-50 for the removal action may be reviewed, by appointment only, at the EPA Region I Superfund Records Center

37. DRAFT Petroleum Release Assessment, Cash Energy Facility, Plaistow, New Hampshire, prepared by Aries Engineering, Inc., dated 17 September 1991.
38. "Preliminary Hydrogeologic Study, Cash Energy Facility, Plaistow, New Hampshire," prepared by Aries Engineering, Inc., dated 20 November 1991.
39. Draft for Public Comment, Public Health Assessment, Beede Waste Oil, Plaistow, Rockingham County, New Hampshire, CERCLIS No. NHD018958140, prepared by New Hampshire Department of Public Health Services, dated 1 September 1995.
40. "Underground Storage Tank Program, Phase I Environmental Site Assessment, Beede Waste Oil Site, Kelly Road, Plaistow, New Hampshire," prepared by Haley & Aldrich, dated 24 February 1994.
41. "Test Pit Evacuatuons and Ground Penetrating Radar Survey. Beede Waste Oil Facility, Plaistow, NH," prepared by Aries Engineering, Inc., 17 March 1992.
42. Letter to R. Minicucci, New Hampshire Department of Environmental Services (NHDES) regarding Water Well Surveys, prepared by Beede Waste Oil Corp., dated 27 January 1992.
43. Table I, Cash Energy, Inc. Water Quality Analytical Results for Samples Obtained February 27, 1984, prepared by GTI, dated 27 February 1984.
44. "Project Operations Plan and Waste Characterization Sampling and Analysis Plan, Site and Waste Characterization Activities, Beede Waste Oil/Cash Energy Site, Plaistow, New Hampshire," prepared by Sanborn, Head & Associates, Inc., dated 12 May 1995.
45. "Groundwater/Surface Water Sampling and Analysis, Beede Waste Oil/Cash Energy Site, Plaistow, New Hampshire," prepared by Sanborn, Head & Associates, Inc., dated 17 January 1996.
46. "Additional Environmental Services, Groundwater/Surface Water Sampling and Analysis, Beede Waste Oil/Cash Energy Site, Plaistow, New Hampshire," prepared by Sanborn, Head & Associates, Inc., dated 30 April 1996.
47. "Additional Environmental Services, Groundwater/Surface Water Sampling and Analysis, Beede Waste Oil/Cash Energy Site, Plaistow, New Hampshire," prepared by Sanborn, Head & Associates, Inc., dated 17 September 1996.

48. "Additional Environmental Services, Preliminary Assessment of Remedial Alternatives for Soil Piles, Beede Waste Oil/Cash Energy Site, Plaistow, New Hampshire," prepared by Sanborn, Head & Associates, Inc., dated 28 March 1996.
49. "Additional Environmental Services, Groundwater/Surface Water Sampling and Analysis, Beede Waste Oil/Cash Energy Site, Plaistow, New Hampshire," prepared by Sanborn, Head & Associates, Inc., dated 30 December 1996.
50. Removal Program After Action Report for the Beede Waste Oil Site, Plaistow, New Hampshire, prepared by Roy F. Weston, dated October 1997.